

GMP:NR
F.# 2014R00177

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ MAY 28 2014 ★

BROOKLYN OFFICE

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UNITED STATES OF AMERICA

- against -

JOHN MICHAEL DOMINGUEZ,
Defendant.

S U P E R S E D I N G
I N F O R M A T I O N

Cr. No. 14-46 (BMC)
(T. 31, U.S.C.,
§§ 5332(a), 5332(b)(1)
and 5332(b)(2); T. 21,
U.S.C., § 853(p); T. 18,
U.S.C., §§ 3551 et seq.)

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THE UNITED STATES ATTORNEY CHARGES:

BULK CASH SMUGGLING CONSPIRACY

1. On or about and between January 1, 2013 and September 7, 2013, within the Eastern District of New York, the defendant JOHN MICHAEL DOMINGUEZ, together with others, did knowingly and with intent to evade the currency reporting requirements under Title 31, United States Code, Sections 5316(a)(1)(A) and 5316(b), conspire to conceal more than \$10,000 in currency, to wit: at least approximately \$477,000 in United States currency, on his person and in articles of luggage and other containers, and attempt to transport and transfer such currency from a place within the United States to a place outside of the United States.

(Title 31, United States Code, Sections 5332(a) and 5332(b)(1); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the above-charged offense, the government will seek forfeiture in accordance with Title 31, United States Code, Section 5332(b)(2), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, and any property traceable to such property, including but not limited to:

a. \$70,690.00 in United States currency seized on or about October 2, 2013, from a location at Mercedes Drive, Punta Gorda, Florida;

b. one 2014 Chevrolet Corvette, Vehicle Identification Number 1G1YM2D74E510986, seized on or about October 2, 2013, from a location at Mercedes Drive, Punta Gorda, Florida; and

c. one 2013 Mercedes Benz ML350, Vehicle Identification Number 4JDA5HB3DA253715, seized on or about October 2, 2013, from a location at Mercedes Drive, Punta Gorda, Florida.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;


c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 31, United States Code, Section 5332(b)(2); Title 21, United States Code, Section 853(p))


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK